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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JUN 06 2023

SEAN F. McAVOY, CLERK  
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SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICK LYNN JOHNSON,

Defendant.

2:23-CR-64-TOR

INDICTMENT

18 U.S.C. § 2252A(a)(2)(A), (b)(1)  
Receipt of Child Pornography  
(Count 1)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)  
Distribution of Child Pornography  
(Count 2)

18 U.S.C. § 2252A(a)(5)(B), (b)(2)  
Possession of Child Pornography  
(Count 3)

18 U.S.C. § 2253  
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on or about May 30, 2021, and continuing through on or about June 16, 2022, in the Eastern District of Washington, the Defendant, RICK LYNN JOHNSON, did knowingly receive child pornography, as defined in 18 U.S.C. § 2256(8)(A), the production of which involved the use of minors engaging in sexually explicit conduct, and which visual depictions were of such conduct, that

1 had been mailed, and shipped and transported using any means and facility of  
2 interstate and foreign commerce and in and affecting interstate and foreign  
3 commerce by any means, including by computer, and that was produced using  
4 materials that had been mailed, and shipped and transported in and affecting  
5 interstate and foreign commerce by any means, including by computer, to wit:  
6 visual depictions of minors engaging in sexually explicit conduct, including, but  
7 not limited to, the lascivious exhibition of their genitals and pubic areas, in  
8 violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

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COUNT 2

Beginning on or about May 30, 2021, and continuing through on or about  
June 16, 2022, in the Eastern District of Washington, the Defendant, RICK LYNN  
JOHNSON, did knowingly distribute child pornography, as defined in 18 U.S.C.  
§ 2256(8)(A), the production of which involved the use of minors engaging in  
sexually explicit conduct, and which visual depictions were of such conduct, that  
had been mailed, and shipped and transported using any means and facility of  
interstate and foreign commerce and in and affecting interstate and foreign  
commerce by any means, including by computer, and that was produced using  
materials that had been mailed, and shipped and transported in and affecting  
interstate and foreign commerce by any means, including by computer, to wit:  
visual depictions of minors engaging in sexually explicit conduct, including, but  
not limited to, the lascivious exhibition of their genitals and pubic areas, in  
violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

COUNT 3

On or about November 9, 2022, in the Eastern District of Washington, the  
Defendant, RICK LYNN JOHNSON, did knowingly possess material which  
contained one or more visual depictions of child pornography, as defined in 18  
U.S.C. § 2256(8)(A), the production of which involved the use of minors engaging  
in sexually explicit conduct, and which visual depictions were of such conduct,

1 that had been mailed, and shipped and transported using any means and facility of  
2 interstate and foreign commerce and in and affecting interstate and foreign  
3 commerce by any means, including by computer, and that was produced using  
4 materials that had been mailed, and shipped and transported in and affecting  
5 interstate and foreign commerce by any means, including by computer, to wit:  
6 visual depictions of minors, including prepubescent minors and minors who had  
7 not attained 12 years of age, engaging in sexually explicit conduct, all in violation  
8 of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

9 NOTICE OF FORFEITURE ALLEGATIONS

10 The allegations contained in this Indictment are hereby realleged and  
11 incorporated by reference for the purpose of alleging forfeitures.

12 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of  
13 18 U.S.C. § 2252A(a)(2), (b)(1), and/or 18 U.S.C. § 2252A(a)(5)(B), (b)(2), as  
14 alleged in Counts 1, 2, and/or 3 of this Indictment, the Defendant, RICK LYNN  
15 JOHNSON, shall forfeit to the United States any visual depiction described in  
16 section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book,  
17 magazine, periodical, film, videotape, or other matter which contains any such  
18 visual depiction, which was produced, transported, mailed, shipped or received in  
19 violation of this chapter; any property, real or personal, constituting or traceable to  
20 gross profits or other proceeds obtained from such offenses; and, any property, real  
21 or personal, used or intended to be used to commit or to promote the commission  
22 of such offenses, or any property traceable to such property, including, but not  
23 limited to, the following:

- 24 - A Motorola G7 phone, Model XT1962-1;
  - 25 - A 400GB Western Digital SATA hard drive, SN: WCAS80602129; and
  - 26 - A 400GB Western Digital SATA hard drive, SN: WCAS80646757.
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1 If any of the property described above, as a result of any act or  
2 omission of the Defendant:

- 3 a. cannot be located upon the exercise of due diligence;  
4 b. has been transferred or sold to, or deposited with, a third party;  
5 c. has been placed beyond the jurisdiction of the Court;  
6 d. has been substantially diminished in value; or  
7 e. has been commingled with other property which cannot be  
8 divided without difficulty,

9 the United States of America shall be entitled to forfeiture of substitute property  
10 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

11 DATED this 6 day of June 2023.

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13 A TRUE BILL  
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